

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JINGYU CHEN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-05387 (PMH)
)	
YONG ZHAO CAI, <i>et al.</i>,)	NOTICE OF MOTION TO DISMISS
)	<u>SECOND AMENDED COMPLAINT</u>
Defendants.)	
)	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Defendant Organizations’ Second Motion to Dismiss, the attached Declaration of Terri E. Marsh, with attached exhibits, all prior pleadings, orders, and proceedings herein, Defendants New York Falun Dafa Association Corp.; The Eastern US Buddha’s Study (Falun Dafa) Association, Inc.; Falun Dafa Information Center, Inc.; Friends of Falun Gong Inc.; NY Metropolitan Falun Dafa Association Inc.; International Falun Dafa Association, Inc.; Falun Gong Club of Orange County, Inc.; and Upstate Falun Dafa Association, Inc. (“the Defendant Organizations”) move this Court (Philip M. Halpern, United States District Judge, for an order dismissing Plaintiff’s Amended Complaint as against the Defendant Organizations in its entirety and with prejudice, pursuant to Federal Rule of Civil Procedure 12(b)(6); and granting such other relief as this Court deems just and proper.

DATED: Washington D.C.
May 13, 2021

HUMAN RIGHTS LAW FOUNDATION,

/s/ Terri E. Marsh

1701 Rhode Island Ave., N.W.

Suite 4-717

Washington, D.C. 20036

Tel.: (202-697-3858)

Email: Terri.marsh.hrlf@gmail.com

Attorney for the Defendant Organizations